

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

TOWER HEALTH, f/k/a READING HEALTH SYSTEM, <i>et al.</i> ,	:	
	:	No. 5:19-cv-02782-EGS
Plaintiffs,	:	
	:	
v.	:	
	:	
CHS/COMMUNITY HEALTH SYSTEMS, INC., <i>et al.</i> ,	:	
	:	
Defendants.	:	
	:	

**PLAINTIFFS' MOTION TO EXCLUDE DEFENDANTS' PROPOSED EXPERT
OPINIONS AND TESTIMONY**

Pursuant to Fed. R. Evid. 702, Plaintiffs Tower Health, f/k/a Reading Health System, *et al.*, through their undersigned counsel, move to exclude the opinions and testimony at trial of four expert witnesses designated by Defendants. In support, Plaintiffs submit their accompanying Brief, which is being filed contemporaneously herewith and is incorporated herein by reference. For the reasons more fully set forth in Plaintiffs' Brief, Plaintiffs respectfully request that the Court grant this Motion and exclude the opinions and testimony of Hubert Worrell, Craig Hofmeister, John Galassini, and Sean Kruskol at trial.

STEVENS & LEE

Date: April 14, 2021

By: *s/ Julie E. Ravis*

Daniel B. Huyett (Pa. ID No. 21385)
Julie E. Ravis (Pa. ID No. 203101)
Matthew J. Banta (Pa. ID No. 326413)
111 North Sixth Street
Reading, PA 19601
Phone: (610) 478-2219
Email: dbh@stevenslee.com,
jera@stevenslee.com, mb@stevenslee.com

Joseph E. Wolfson (Pa. ID No. 44431)
1500 Market Street, East Tower, 18th Floor
Philadelphia, PA 19102
Phone: (215) 751-1249
Fax: (610) 988-0808
Email: jwo@stevenslee.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2021, a copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Julie E. Ravis

Julie E. Ravis